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July 30, 1998

Certified Mail No. _____

Mr. David Cox, Permits Section
Bureau of Waste Management
Kansas Department of Health and Environment
Forbes Field, Building 740
Topeka, KS 66620-0001

Re: **Class 1 Permit Modifications,**
Safety-Kleen (Wichita) Inc., EPA ID. Number KSD 007246846

Dear Mr. Cox:

Pursuant to Section 270.42 of 40 CFR, this letter will provide your office with notice of the following modifications to this facility's hazardous waste permit. They are Class I administrative and informational changes, equipment replacements or upgrades with functionally equivalent components, or corrections of typographical errors in the text of the permit application.

- Removal of references to the Shredder and Granulator Miscellaneous Units, which are being closed in accordance with the partial closure provisions of Section J of the permit application.
 - Correction of some facility drawings to more accurately represent the positions of fences and off-permit buildings.
 - Replacement of certain piping drawings, to keep the permit current where equipment has been replaced with functionally equivalent components.
 - Replacement of the facility name "Laidlaw Environmental Services (Wichita), Inc." with the new name "Safety-Kleen (Wichita) Inc."
- The shredder and granulator with their associated ancillary equipment (ducts, cyclone, baghouse, carbon bed and fan) will be closed in accordance with the requirements of Section J-9c(2), Miscellaneous Unit, Unit Closure Procedures of Section J of Part B of the facility permit application. This equipment will be closed in accordance with the applicable parts of the schedule in Table J.6:

<u>Date</u>	<u>Calendar Days Lapsed</u>	<u>Closure Activity</u>
7/30/98	0	Receipt of known final volume of hazardous waste.
10/21/98	90	Removal of waste inventory.
11/27/98	120	Complete decontamination of miscellaneous unit(s) and equipment.
12/27/98	150	Complete dismantling/removal of decontaminated miscellaneous unit(s) and equipment (when removal is necessary). Not Applicable
1/26/99	180	Complete final closure activities. Not Applicable

The units, ancillary equipment and structures (i.e. catwalks and supports) will be decontaminated in accordance with Section J-4a and may be either salvaged for future use or left in place per item 4C of Section J-9c(2), or may be decontaminated and transferred to another TSDF for use per

item 4D. Any elements which are not successfully decontaminated will be dismantled and disposed of as a hazardous waste at a RCRA/HSWA permitted off-site disposal facility. The building itself will not be closed, and the rooms in which this equipment was located will remain permitted for the storage of hazardous waste in containers.

All wastes generated from this closure activity will be managed in accordance with applicable regulations as site generated solid waste, as described in Section J-4b. Generated wastes meeting the definition of "hazardous waste" under 40 CFR 261.3 will be handled as described in Section J-4b. Decontamination of these units and their ancillary equipment will follow the procedure described in Section J-4a(2)(b), HWMUs with internal or complicated external parts.

- Some, but not all of the plot plan drawings submitted with the permit application incorrectly represent the fencing provided around Buildings I and J, and details of the fencing joining Building B and the Laboratory. This modification will correct these errors and update the drawings to include the new structure, Building K, which is not permitted for the management of regulated materials.

In recent phone conversations, I informed you that we anticipated building a permanent structure to the east of Buildings J and K for the collection of Household Hazardous Wastes, under an agreement with the Wichita/Sedgwick County Department of Health. This new facility will not be permitted for the management or storage of RCRA materials, and will impact our permit only on the drawings that represent the physical layout of the facility. We agreed at that time to delay making the above corrections to drawings of the facility's fences so that the changes caused by this new construction could be included. Discussions between the City and Sedgwick County have delayed the start of this project, and the final form of the HHW facility has not been determined. The above inaccuracies in the permit were noted in the recent RCRA inspection of this facility, and rather than delay this corrective modification to the permit indefinitely we feel it best to correct the permit drawings now, and represent the facility as it is at this time. Those drawings which are affected by the HHW project will be modified when the final form of that facility is determined.

- The vent systems for the hazardous waste storage tanks were upgraded to meet the requirements of Subpart CC of RCRA. No change was made in the function of these systems as described in Section E, Tank Systems, of the permit application. Also, the facility's program for compliance with subparts BB and CC of RCRA has recently been reviewed. As a result of this review, the P&ID drawings and equipment lists describing the tank systems and their piping, and showing the tagged points subject to monitoring under these programs, were revised to show the new vent systems and the current details of piping in the tank systems. Again, no changes have been made to the function of these systems as described in the permit application. The affected drawings in Sections N, Air Emissions, and Y, Facility Drawings, are being replaced with current drawings, and the equipment lists in Appendix N-D are being replaced with current lists.
- Notification was provided to your office on July 7, 1998, of the change of the name of this facility, its owner and operators, to Safety-Kleen (Wichita), Inc. A revised copy of Part A of the permit application reflecting this change was sent to you on July 10. The text of Part B of the application is being changed to substitute the new name for the old name when it is referenced. This represents no change to the ownership or operation of the facility, but involves regenerating and reprinting all fourteen sections of the application with their figures, and should be completed by August 14. Copies of the replacements for drawings and lists in Sections N and Y will be included in the replacement text.

Notification of these Class 1 modifications will be sent to the facility mailing list, as required by 40 CFR 270.42(a)(1)(ii), by August 14. If you have additions or changes to the mailing list as used for the last permit modifications, please send them to me and we will include them in the notification.

Thank you for your assistance throughout the development of these matters. Please call me if you have any questions.

Sincerely,



Ronald K. Robertson
Facility Environmental Manager

cc: Wes Bartley - USEPA Region VII, RCRA Branch
Mark Bradbury, KDHE/SCDO
Mike McCord, KDHE/NCDO Salina
Bill Ross - LES San Jose
Rusty Dunn - LES Wichita